

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

**FAMILY DOLLAR, INC.,**

*Plaintiff,*

**v.**

**AMERICAN ARBITRATION  
ASSOCIATION, INC.,**

*Defendant.*

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**Case No.** \_\_\_\_\_

**COMPLAINT**

**EXHIBIT F**

**From:** AAA Heather Santo <heathersanto@adr.org>  
**Sent:** Monday, December 30, 2019 9:34 AM  
**To:** Beth Berman; [REDACTED]  
**Cc:** Elaine Hogan; Sara Rafal  
**Subject:** RE: AAA claimants

Dear Counsel,

This will acknowledge receipt of Respondent's email dated December 27, 2019. We ask that the parties inform us once they are ready to proceed and provide the list of cases. The parties can share directly any information regarding cases that have settled or those that will not be proceeding before AAA.

Please do not hesitate to contact me should you have any questions.

Sincerely,

Heather Santo



**Heather Santo**

American Arbitration Association

1301 Atwood Ave, Suite 211N, Johnston, RI 02919  
T: 401 431 4703 F: 401 435 6529 E: heathersanto@adr.org  
[adr.org](mailto:heathersanto@adr.org) | [icdr.org](http://icdr.org) | [aaamediation.org](http://aaamediation.org)



The information in this transmittal (including attachments, if any) is privileged and/or confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the intended recipient. If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies of the transmittal. Thank you.

---

**From:** Beth Berman <bberman@dollartree.com>  
**Sent:** Friday, December 27, 2019 1:22 PM  
**To:** AAA Heather Santo <heathersanto@adr.org>; [REDACTED]  
**Cc:** Elaine Hogan <ehogan2@dollartree.com>; Sara Rafal <srafal@dollartree.com>  
**Subject:** RE: AAA claimants

**\*\*\* External E-Mail - Use Caution \*\*\***

The following 29 claimants have accepted settlement offers and will be withdrawing their arbitration demands. Accordingly, please remove them from the list of claimants. We anticipate more claimants will be withdrawing their demands in the next week or two. Thank you.

[REDACTED]

[REDACTED]

Respectfully,  
Beth Hirsch Berman  
Deputy General Counsel, Litigation  
Dollar Tree  
500 Volvo Parkway  
Chesapeake, VA 23320  
Direct Dial: (757) 321-5966  
Fax Number: (757) 321-5949  
[bberman@dollartree.com](mailto:bberman@dollartree.com)



---

**From:** AAA Heather Santo [<mailto:heathersanto@adr.org>]

**Sent:** Thursday, December 12, 2019 9:31 AM

**To:** [REDACTED] Beth Berman  
<[bberman@dollartree.com](mailto:bberman@dollartree.com)>

**Cc:** Elaine Hogan <[ehogan2@dollartree.com](mailto:ehogan2@dollartree.com)>; Sara Rafal <[srafal@dollartree.com](mailto:srafal@dollartree.com)>

**Subject:** RE: AAA claimants

Dear Counsel,

This will confirm the demands for arbitration for [REDACTED] and [REDACTED] have been withdrawn.

We will proceed with administration of the remaining 1,164 individual demands for arbitration upon receipt of Respondent's payment in the amount of \$2,560,800.00. Please mail your check to the American Arbitration Association at 13727 Noel Road, Suite 700, Dallas, TX 75240.

Please do not hesitate to contact me should you have any questions.

Sincerely,

Heather Santo



**Heather Santo**

American Arbitration Association

1301 Atwood Ave, Suite 211N, Johnston, RI 02919  
T: 401 431 4703 F: 401 435 6529 E: [heathersanto@adr.org](mailto:heathersanto@adr.org)  
[adr.org](http://adr.org) | [icdr.org](http://icdr.org) | [aaamediation.org](http://aaamediation.org)



The information in this transmittal (including attachments, if any) is privileged and/or confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the intended recipient. If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies of the transmittal. Thank you.

---

**From:** [REDACTED]  
**Sent:** Wednesday, December 11, 2019 8:07 PM  
**To:** AAA Heather Santo <[heathersanto@adr.org](mailto:heathersanto@adr.org)>  
**Cc:** Elaine Hogan <[ehogan2@dollartree.com](mailto:ehogan2@dollartree.com)>; Sara Rafal <[srafal@dollartree.com](mailto:srafal@dollartree.com)>; Beth Berman <[bberman@dollartree.com](mailto:bberman@dollartree.com)>; [REDACTED]  
**Subject:** RE: AAA claimants

**\*\*\* External E-Mail – Use Caution \*\*\***

Ms. Santo,

Keller Lenkner is hereby withdrawing the demands for arbitration we filed on behalf of [REDACTED] and [REDACTED].

Please let us know if you require any additional information to process the withdrawal.

Best,

[REDACTED]

[REDACTED]

---

**From:** Beth Berman <[bberman@dollartree.com](mailto:bberman@dollartree.com)>  
**Sent:** Wednesday, December 4, 2019 4:50 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED] Elaine Hogan <[ehogan2@dollartree.com](mailto:ehogan2@dollartree.com)>; Sara Rafal <[srafal@dollartree.com](mailto:srafal@dollartree.com)>; AAA Heather Santo <[heathersanto@adr.org](mailto:heathersanto@adr.org)>  
**Subject:** AAA claimants

We identified the following additional claimants who are untimely. The last day each one worked was more than 3 years before the demands were filed. Accordingly, we would appreciate you asking AAA to remove them from the list of demands you sent to AAA last week.

Name Worked	Date Demand Served	Termination Date	Last Day
----------------	--------------------	------------------	----------

7/9/2019

8/18/2016

6/7/2016

9/20/2019

9/9/2016

8/4/2016

Thank you

Respectfully,  
Beth Hirsch Berman  
Deputy General Counsel, Litigation  
Dollar Tree  
500 Volvo Parkway  
Chesapeake, VA 23320  
Direct Dial: (757) 321-5966  
Fax Number: (757) 321-5949  
[bberman@dollartree.com](mailto:bberman@dollartree.com)



---

**\*\*PRIVILEGE AND CONFIDENTIALITY NOTICE:** The information in this e-mail is intended for the named recipient(s) only. This e-mail may contain confidential, proprietary or privileged information. If you are not an intended recipient, please advise by return e-mail and delete immediately without reading, printing, or forwarding to others.

---

**\*\*PRIVILEGE AND CONFIDENTIALITY NOTICE:** The information in this e-mail is intended for the named recipient(s) only. This e-mail may contain confidential, proprietary or privileged information. If you are not an intended recipient, please advise by return e-mail and delete immediately without reading, printing, or forwarding to others.